

ENTERED

March 11, 2024

Nathan Ochsner, Clerk

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY III LLC, et al.	§	Case No. 20-33948 (MI)
	§	
	§	(Jointly Administered)
Post-Effective date Debtors.¹	§	

**THIRD STIPULATION AND AGREED ORDER CONTINUING DEADLINE TO
RESPOND TO CERTAIN OF PLAN ADMINISTRATOR'S CLAIM OBJECTIONS
AND REQUEST TO RESET HEARING DATE**

[Related to Docket Nos. 2846, 2852 and 2856]

David Dunn ("Administrator"), as Plan Administrator of Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, Fieldwood Energy Inc., GOM Shelf LLC and FW GOM Pipeline, Inc., Debtors (the "Post-Effective Date Debtors"); Zurich American Insurance Company ("Zurich"); U.S. Specialty Insurance Company ("USSIC"); and HCC International Insurance Company PLC ("HCC") (collectively, Zurich, USSIC and HCC, are the "Sureties" and the Sureties, together with the Administrator, the "Parties" and each a "Party") submit this *Third Stipulation and Agreed Order to Continuing Deadline to Respond to Certain of Plan Administrator's Claim Objections and Request to Reset Hearing* (the "Stipulation") for entry by the Court, in which the parties stipulate that:

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494); Fieldwood Energy, Inc. (4991, GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore, LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Offshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703; and Galveston Bay Processing LLC (0422).

1. WHEREAS, On August 3, 2020 and August 4, 2020 (as applicable, the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the United States Code (the “Bankruptcy Case”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

2. WHEREAS, on August 17, 2023, the Administrator filed objections to the Sureties’ proofs of claim as further described in the objections filed at Docket Nos. 2846, 2852 and 2856 (collectively, the “Objections”).

3. WHEREAS, on September 11, 2023, the Parties filed the *Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing Date* [Dkt No. 2875].

4. WHEREAS, on September 12, 2023, the Court entered the *Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing* [Dkt No. 2877].

5. WHEREAS, on December 7, 2023, the Court entered the *Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing* [Dkt No. 2980].

6. WHEREAS, the hearing on the Objections is currently set for March 21, 2024 at 9:00 a.m.

7. WHEREAS, the Sureties’ response date to the Objections is currently March 12, 2024.

8. WHEREAS, the Parties have agreed to extend the deadline for the Sureties to respond to the Objections until Thursday, May 9, 2024 (the “Extended Response Deadline”).

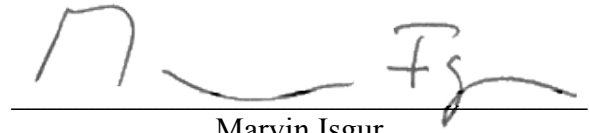
9. WHEREAS, for the foregoing reasons, the Administrator and Sureties request a continuance of the March 21, 2024 hearing with respect to the Objections. The Administrator and the Sureties request the hearing be continued until after the Extended Response Deadline to a date that the Court is available.

NOW, THEREFORE, based upon the agreement of the Parties, and for good cause shown, it is hereby **ORDERED, ADJUDGED** and **DECREED** that:

1. The date for the Sureties to respond to the Objections is continued until May 9, 2024.

2. The hearing on the Administrator's Objections [Docket Nos. 2846, 2852 and 2856] is set for May 21, 2024 at 10:30 a.m.

Signed: March 11, 2024



Marvin Isgur
United States Bankruptcy Judge

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

Dated: March 7, 2024

<p>BONDS ELLIS EPPICH SCHAFFER JONES LLP</p> <p>By: <u>/s/ Ken Green (by permission)</u> Ken Green Texas State Bar No. 24036677 Aaron Guerrero Texas State Bar No. 24050698 Bryan Prentice Texas State Bar No. 24099787 950 Echo Lane, Suite 120 Houston, Texas 77024 Telephone: (713) 335-4990 Facsimile: (713) 335-4991 Email: ken.green@bondsellis.com aaron.guerrero@bondsellis.com bryan.prentice@bondsellis.com</p> <p>ATTORNEYS FOR DAVID DUNN, THE PLAN ADMINISTRATOR FOR THE POST-EFFECTIVE DATE DEBTORS</p>	
<p>CLARK HILL PLC</p> <p>By: <u>/s/ Duane J. Brescia (by permission)</u> Duane J. Brescia 720 Brazos, Suite 700 Austin, Texas 78701 Tel: (512) 499-3647 Fax: (512) 499-3660 Email: DBrescia@clarkhill.com</p> <p>ATTORNEYS FOR ZURICH AMERICAN INSURANCE COMPANY</p>	<p>LOCKE LORD LLP</p> <p>By: <u>/s/ Philip Eisenberg</u> Philip Eisenberg Elizabeth M. Guffy Simon R. Mayer 600 Travis St., Suite 2800 Houston, Texas 77002 Tel: (713) 226-1304 peisenberg@lockelord.com eguffy@lockelord.com simon.mayer@lockelord.com</p> <p>ATTORNEYS FOR HCC INTERNATIONAL INSURANCE COMPANY PLC, U.S. SPECIALTY INSURANCE COMPANY</p>